

1  
2  
3  
4  
5  
6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA  
8

9 LIBERTY MEDIA HOLDINGS, LLC )

Case No. \_12-cv-00923-LRH-GWF

10 Plaintiff, )

11 vs. )

**DECLARATION OF ERIKA DILLON IN  
SUPPORT OF PLAINTIFF'S OPPOSITION  
TO MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION**

12 SERGEJ LETYAGIN, d/b/a )  
13 SUNPORNO.COM; IDEAL CONSULT, )  
14 LTD.; "ADVERT"; "CASTA"; )  
15 "TRIKSTER"; "WORKER"; "LIKIS"; )  
"TESTER" and DOES 1-50 )

16 Defendants )  
17

18 I, ERIKA DILLON, hereby declare under penalty of perjury:  
19

20 1. I am over the age of 18 and am a resident of the state of Nevada.

21 2. I have personal knowledge of the facts herein, and, if called as a witness, could  
22 testify competently thereto.

23 3. I am employed by Plaintiff Liberty Media Holdings, LLC as an in-house paralegal  
24 and online investigator, and this declaration is provided in my capacity as the latter.  
25

26 4. As part of my research into this case, I created an account at SunPorno.com.

27 5. Once an individual creates an account on the SunPorno.com website, they are  
28 given access to features that are not otherwise available. Users with accounts can tag videos for

1 later viewing, add videos and other users to favorite sections, and perform other actions that  
2 enhance the user experience with the website, as outlined below.

3 6. Upon initial registration, users choose their own username. See Dillon Dec.  
4 Exhibit A.  
5

6 7. Users automatically have profiles that include things like how many videos the  
7 user has watched, how many videos the user has uploaded and how many other people have  
8 watched the videos that a user has uploaded. This information is generated by the website. See  
9 ECF 1-27 and Dillon Dec. Exhibit B. (Note that SunPorno.com no longer displays a user's join  
10 date, which is something that alerted the Plaintiff to the potential connection between Casta,  
11 Trikster, likis, advert and the Defendants Sergej Letyagin and Ideal Consult, Ltd.)  
12

13 8. Users are, however, given the option to add additional information to their profile,  
14 including their name, gender, birthday, relationship status, sexual preferences, country, and  
15 current town of residence. Furthermore, there is an open box where individuals can input  
16 whatever information they want. Dillon Dec. Exhibit C.  
17

18 9. The profile also allows users to upload a photograph or image, known as an  
19 avatar, that will be used to identify them in conversations, comments, and other places on the  
20 website. Dillon Dec. Exhibit C.  
21

22 10. SunPorno registered users can upload videos, which are then linked to their  
23 account. The page displaying the video lists the user's name where it denotes who the video was  
24 "added by." Dillon Dec. Exhibit D.

25 11. Users are allowed to upload videos, title them, and provide subject information  
26 like what categories their video fits into (i.e. is the video straight, gay, oral, hardcore, etc.).  
27 Dillon Dec. Exhibit D. (Note that there is currently a suspension on the uploading of videos.)  
28

1           12. On the video pages, users can rate the quality of the video, comment on the video,  
2 list the video as a “favorite” video, download the video, and add tags to the video. Dillon Dec.  
3 Exhibit D.

4           13. SunPorno users can “friend” other users and comment on other users’ profile  
5 pages. This allows user to interact with each other, recommend videos, ask questions about the  
6 videos others have posted. Dillon Dec. Exhibit E. Furthermore, users can only send messages to  
7 individuals who are their “friends.” Dillon Dec. Exhibit F.

8           14. Additionally, beneath each video, there is a section of the website that provides an  
9 “embed” code, which allows individuals to place the video on another website, embedded in that  
10 website, without requiring users to directly visit the SunPorno.com website. Dillon Dec. Exhibit  
11 D.

12           15. SunPorno allows users to locate videos based on tags, keyword searches, title of  
13 video searches, or through channels that display certain categories of pornography. SunPorno  
14 sorts its videos by particular porn stars and types of pornography. Dillon Dec. Exhibits G, H, I.

15           16. SunPorno also has a section called “community” in which users can post photos  
16 of themselves and browse the photos of other users. Dillon Dec. Exhibit J.

17           17. SunPorno has a tab on its main page called “live cams” which links to  
18 [www.sunpornochat.com](http://www.sunpornochat.com), a website that offers the opportunity to have video chats with other  
19 SunPorno members. Dillon Dec. Exhibit K.

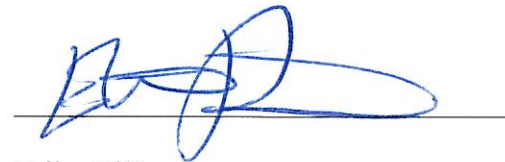
20           18. SunPorno also operates a “Sex Store” at [store.sunporno.com](http://store.sunporno.com), which allows users  
21 to purchase videos, sexual “toys,” and lingerie. Dillon Dec. Exhibit L.

22           19. The “Sex Store” allows individuals to chat with customer support representatives.  
23 I recently communicated with a representative identified as “Andrea.” Andrea informed me that  
24 the company ships from various locations in the United States, will ship anything in the store to  
25

1 Nevada residents, and that any credit card statements would list the Los Angeles based "CNV,  
2 Inc." as the payee. Exhibit 17 to the Opposition.

3 20. The SunPorno website is highly interactive, as I personally have interacted with it.

4 Signed this 19<sup>th</sup> day of July, 2012 in Las Vegas, Nevada.  
5

6   
7

8 Erika Dillon  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28